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May 18, 2011

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Oral Ex Parte Presentation
PS Docket No. 07-114, PS Docket No. 10-255, and WC Docket No. 05-196

Dear Ms. Dortch:

On May 17, 2011, Tamara Preiss, Kevin Green, and the undersigned of Verizon and Robert Morse and Susan Sherwood of Verizon Wireless (together "Verizon"), met with staff of the Public Safety and Homeland Security Bureau ("Bureau") to respond to staff questions concerning next generation 9-1-1 and location accuracy technologies. The following Bureau staff attended: Thomas Beers, Patrick Donovan, Aaron Garza, John Healy, Timothy May, Henning Schulzrinne and David Siehl.

Bureau staff inquired whether it is technically feasible to deliver 9-1-1 location information (i.e., subscriber home address) for Verizon DSL and FiOS subscribers. We explained that 9-1-1 location information is already delivered to PSAPs for these subscribers, but additional research would be necessary to determine the extent to which other IP-enabled devices on the subscriber's premises could utilize that same location information for 9-1-1 purposes.

Bureau staff also inquired whether it is feasible to make GPS-based location information in femtocells available to other IP-enabled devices on the local subnet (i.e., other devices in the user's home). While not all femtocell equipment that Verizon Wireless sells has GPS capabilities, where such location information is used the other IP-enabled devices would need to have the ability to communicate with either the Verizon Wireless network (where the location information transmitted to the PSAP resides) or the femtocell itself. Interoperability standards involving multiple stakeholders (including over-the-top VoIP providers, service providers, and equipment manufacturers) would need to be developed, and device and network changes would be needed to achieve such capability.

Bureau staff inquired how a VoIP provider could access wireless location information for 9-1-1 call routing and ALI transmission purposes. As discussed in our reply comments in PS Docket No. 10-255, should the Commission impose new E-9-1-1 obligations on VoIP providers, the VoIP provider alone should be responsible – for regulatory compliance and liability purposes – for providing reliable 9-1-1 location information.[1] There may well be technical means for over-the-top VoIP providers to access reliable location information, but VoIP providers would need to initiate the necessary standards development processes, determine those solutions themselves and at their own costs, and maintain the necessary commercial relationships with solution and equipment vendors, just as the Commission required of CMRS providers a decade ago for their own E9-1-1 compliance.[2]

Bureau staff also inquired which location capabilities (A-GPS, network-based location determination, and WiFi-based positioning) Verizon Wireless currently uses for providing location information for 9-1-1 calls. Verizon Wireless uses some but not all of these technologies. Verizon Wireless uses A-GPS (network-assisted), Hybrid (A-GPS & AFLT), AFLT and several default location technologies (cell sector with timing, mixed cell sector, cell sector) to provide location information for 9-1-1 calls. Verizon Wireless does not currently use WiFi-based positioning for 9-1-1 call location given concerns for the accuracy and reliability of information in vendors' databases.

Bureau staff asked whether Verizon Wireless maintains data on the reliability and availability of Phase II-provided location information, including the fraction of wireless 9-1-1 calls that provide usable Phase II location, beyond Phase I base station location information. Verizon Wireless maintains a breakdown of types of 9-1-1 location fixes for test data as well as actual calls. The data for actual calls would be over inclusive, however, as it would include, for example, calls from non-location capable handsets and erroneous 9-1-1 calls of short duration ("quick hang ups").

Finally, Bureau staff asked about Verizon's views concerning E-9-1-1 Phase II compliance testing. As stated in Verizon's comments earlier this year, compliance and maintenance testing parameters should not be codified in binding rules.[3] Instead, the Commission should consider policy guidance (such as an update to OET Bulletin 71) that instructs the development of industry best practices. In this regard, Working Group 4C of the Communications Security, Reliability and Interoperability Council ("CSRIC") recommended earlier this year that the Commission establish an E9-1-1 Technical Advisory Group ("ETAG") representing all relevant stakeholders to address various location technology issues, including

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[1] *See* Reply Comments of Verizon and Verizon Wireless in PS Docket No. 10-255, filed Mar. 14, 2011, at 12-13.

[2] There are no standards today that would enable an underlying network provider to deliver location information to a PSAP other than the registered location the over-the-top VoIP provider obtains from its customer. *See* Comments of Verizon and Verizon Wireless in PS Docket No. 07-114 and WC Docket No. 05-196, filed Jan. 19, 2011, at 17.

[3] *See id*. at 12-13.

means of "improv[ing] the manner in which location accuracy is measured."[4] The ETAG could build upon existing guidelines, such as OET Bulletin 71 and the ATIS Emergency Services Interconnection Forum ("ESIF") *High Level Requirements for Accuracy Testing Methodologies*, and address this issue in a manner that accounts for the complexities of the testing process and issues concerning methodology and frequency.

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Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), this letter is being filed electronically in the above-referenced proceedings. Please let me know if you have any questions.

Sincerely,

cc: David Furth
Thomas J. Beers
Patrick Donovan
Aaron Garza
John Healy
Timothy May
Henning Schulzrinne
David Siehl

[4] *See* Communications Security, Reliability and Interoperability Council, Working Group 4C, Final Report, *Technical Options for E9-1-1 Location Accuracy*, at § 9.1 (Mar. 14, 2011), at http://transition.fcc.gov/pshs/docs/csric/CSRIC_4C_Comprehensive_Final_Report.pdf.